STATE OF NORTH CAROLINA

CUMBERLAND County

File No. 21 CVS 3800

In The General Court Of Justice
☐ District ☒ Superior Court Division

Name Of Plaintiff	
Latonia BilBo, et al	
Address	**CIVIL SUMMONS**
532 Old Farm Road	☐ **ALIAS AND PLURIES SUMMONS (ASSESS FEE)**
City, State, Zip	
Fayetteville, NC 28314	
VERSUS	G.S. 1A-1, Rules 3 and 4
Name Of Defendant(s)	Date Original Summons Issued
LAN-WAY ROOFING CO., INC	6/15/2021
	Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1	Name And Address Of Defendant 2
LAN-WAY ROOFING CO., INC 511 Saint Andrew Street Tarboro, NC 27886	

IMPORTANT! You have been sued! These papers are legal documents, DO NOT throw these papers out! You have to respond within 30 days. You may want to talk with a lawyer about your case as soon as possible, and, if needed, speak with someone who reads English and can translate these papers!

¡IMPORTANTE! ¡Se ha entablado un proceso civil en su contra! Estos papeles son documentos legales. ¡NO TIRE estos papeles!
Tiene que contestar a más tardar en 30 días. ¡Puede querer consultar con un abogado lo antes posible acerca de su caso y, de ser necesario, hablar con alguien que lea inglés y que pueda traducir estos documentos!

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of ~~Plaintiff's Attorney~~ (if none, Address Of Plaintiff)	Date Issued	Time
Latonia Bilbo, Freddie, Iron Horse, McKnight, et al. 532 Old Farm Road Fayetteville, NC 28314	6-15-21	2:52 ☐ AM ☒ PM
	Signature	
	☒ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court	

☐ ENDORSEMENT (ASSESS FEE)
This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement	Time
	☐ AM ☐ PM
Signature	
☐ Deputy CSC ☐ Assistant CSC ☐ Clerk Of Superior Court	

NOTE TO PARTIES: *Many counties have **MANDATORY ARBITRATION** programs in which most cases where the amount in controversy is $25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.*

(Over)

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STATE OF NORTH CAROLINA

CUMBERLAND County

File No. 21 CVS 3800

FILED

2021 JUN 15 P 2:52

CUMBERLAND CO., C.S.C.

BY

In The General Court Of Justice
☐ District ☒ Superior Court Division

GENERAL CIVIL ACTION COVER SHEET
☒ INITIAL FILING ☐ SUBSEQUENT FILING

Rule 5(b) of the General Rules of Practice for the Superior and District Courts

Name And Address Of Plaintiff 1
Latonia BilBo, 532 Old Farm Road, Fayetteville, NC 28314
Sandra Freddie, 6841 Woodmark Drive, Fayetteville, NC 28314
L. Reynaud Iron Horse, PO Box 164, Shannon NC 28386

Name And Address Of Plaintiff 2
Fran McKnight, 7016 Trevor Lane, Fayetteville, NC 28314

VERSUS

Name And Address Of Defendant 1
LAN-WAY ROOFING CO., INC
511 Saint Andrew Street
Tarboro, NC 27886

Summons Submitted
☒ Yes ☐ No

Name And Address Of Defendant 2

Summons Submitted
☐ Yes ☐ No

Name And Address Of ~~Attorney~~ Or Party, If Not Represented (complete for initial appearance or change of address)
Latonia Bilbo, et als, 532 Old Farm Rd, Fayetteville NC 28314
Sandra Freddie, 6841 Woodmark Dr, Fayetteville, NC 28314
L. Reynaud Iron Horse, PO Box 164, Shannon NC 28386
Fran McKnight,7016 Trevor Ln,Fayetteille NC 28314

Telephone No. 910-495-6926
Cellular Telephone No.
~~NC Attorney Bar No.~~ N/A
~~Attorney Email Address~~ N/A

☐ Initial Appearance in Case ☐ Change of Address

~~Name Of Firm~~ PRO SE
Fax No. N/A

~~Counsel For~~
☐ All Plaintiffs ☐ All Defendants ☐ Only: *(list party(ies) represented)*

☒ Jury Demanded In Pleading ☐ Complex Litigation ☒ Stipulate to Arbitration

TYPE OF PLEADING

(check all that apply)

- ☐ Amend (AMND)
- ☐ Amended Answer/Reply (AMND-Response)
- ☐ Amended Complaint (AMND)
- ☐ Assess Costs (COST)
- ☐ Answer/Reply (ANSW-Response) *(see Note)*
- ☐ Change Venue (CHVN)
- ☒ Complaint (COMP)
- ☐ Confession Of Judgment (CNFJ)
- ☐ Consent Order (CONS)
- ☐ Consolidate (CNSL)
- ☐ Contempt (CNTP)
- ☐ Continue (CNTN)
- ☐ Compel (CMPL)
- ☐ Counterclaim (CTCL) *Assess Court Costs*
- ☐ Crossclaim *(list on back)* (CRSS) *Assess Court Costs*
- ☐ Dismiss (DISM) *Assess Court Costs*
- ☐ Exempt/Waive Mediation (EXMD)
- ☐ Extend Statute Of Limitations, Rule 9 (ESOL)
- ☐ Extend Time For Complaint (EXCO)
- ☐ Failure To Join Necessary Party (FJNP)
- ☐ Failure To State A Claim (FASC)
- ☐ Implementation Of Wage Withholding In Non-IV-D Cases (OTHR)
- ☐ Improper Venue/Division (IMVN)
- ☐ Including Attorney's Fees (ATTY)
- ☐ Intervene (INTR)
- ☐ Interplead (OTHR)
- ☐ Lack Of Jurisdiction (Person) (LJPN)
- ☐ Lack Of Jurisdiction (Subject Matter) (LJSM)
- ☐ Modification Of Child Support In IV-D Actions (MSUP)
- ☐ Notice Of Dismissal With Or Without Prejudice (VOLD)
- ☐ Petition To Sue As Indigent (OTHR)
- ☐ Rule 12 Motion In Lieu Of Answer (MDLA)
- ☐ Sanctions (SANC)
- ☐ Set Aside (OTHR)
- ☐ Show Cause (SHOW)
- ☐ Transfer (TRFR)
- ☐ Third Party Complaint *(list Third Party Defendants on back)* (TPCL)
- ☐ Vacate/Modify Judgment (VCMD)
- ☐ Withdraw As Counsel (WDCN)
- ☐ Other *(specify and list each separately)*

NOTE: *All filings in civil actions shall include as the first page of the filing a cover sheet summarizing the critical elements of the filing in a format prescribed by the Administrative Office of the Courts, and the Clerk of Superior Court shall require a party to refile a filing which does not include the required cover sheet. For subsequent filings in civil actions, the filing party must include either a General Civil (AOC-CV-751), Motion (AOC-CV-752), or Court Action (AOC-CV-753) cover sheet.*

AOC-CV-751, Rev. 3/19, © 2019 Administrative Office of the Courts

CLAIMS FOR RELIEF

- ☐ Administrative Appeal (ADMA)
- ☐ Appointment Of Receiver (APRC)
- ☐ Attachment/Garnishment (ATTC)
- ☐ Claim And Delivery (CLMD)
- ☐ Collection On Account (ACCT)
- ☐ Condemnation (CNDM)
- ☐ Contract (CNTR)
- ☐ Discovery Scheduling Order (DSCH)
- ☐ Injunction (INJU)
- ☐ Limited Driving Privilege - Out-Of-State Convictions (PLDP)
- ☐ Medical Malpractice (MDML)
- ☐ Minor Settlement (MSTL)
- ☐ Money Owed (MNYO)
- ☐ Negligence - Motor Vehicle (MVNG)
- ☒ Negligence - Other (NEGO)
- ☐ Motor Vehicle Lien G.S. Chapter 44A (MVLN)
- ☐ Possession Of Personal Property (POPP)
- ☐ Product Liability (PROD)
- ☐ Real Property (RLPR)
- ☐ Specific Performance (SPPR)
- ☐ Other *(specify and list each separately)*

Date 6/14/2021

~~Signature Of Attorney/Party~~ Latoria Bolton, et als Pro Se

Latoria Bolton, ETALS

FEES IN G.S. 7A-308 APPLY
Assert Right Of Access (ARAS)
Substitution Of Trustee (Judicial Foreclosure) (RSOT)
Supplemental Procedures (SUPR)

PRO HAC VICE FEES APPLY
Motion For Out-Of-State Attorney To Appear In NC Courts In A Civil Or Criminal Matter (Out-Of-State Attorney/Pro Hac Vice Fee)

No.	☐ Additional Plaintiff(s)

No.	☐ Additional Defendant(s)	☐ Third Party Defendant(s)	Summons Submitted
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No
			☐ Yes ☐ No

Plaintiff(s) Against Whom Counterclaim Asserted

Defendant(s) Against Whom Crossclaim Asserted

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Latonia Bilbo, Pro Se Plaintiff
532 Old Farm Rd
Fayetteville NC 28314

Sandra Freddie, Pro Se Plaintiff
6841 Woodmark Drive
Fayetteville NC 28314

L. Reynaud Ironhorse, Pro Se Plaintiff
PO Box 164
Shannon, NC 28386

Fran McKnight, Pro Se Plaintiff
7016 Trevor Lane
Fayetteville, NC 28314

Pro Se for Plaintiffs

FILED
2021 JUN 15 P 2:53
CUMBERLAND CO., C.S.C.
BY _____

STATE OF NORTH CAROLINA
COUNTY OF CUMBERLAND

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

Latonia Bilbo, Sandra Freddie, L. Reynaud Iron Horse, Fran McKnight, et als, Individuals,

Plaintiffs,

vs.

LAN-WAY ROOFING CO., INC.
511 Saint Andrew Street, Tarboro, NC,

Defendant.

FILE NUMBER: 21 CVS 3800

CIVIL ACTION
COMPLAINT AND PLEADING

DEMAND FOR JURY TRIAL

CIVIL ACTION COMPLAINT

NOW COMES, Pro Se Plaintiffs, Latonia Bilbo, Sandra Freddie, L. Reynaud Iron Horse, and Fran McKnight, Complainants, by way of this Complaint and Pleadings pursuant to the Rule (3) for the North Carolina Rules of Civil Procedure and the N.C. Gen. Stat. § 1-52 (16), which applies three years for statute of limitations for negligence, personal injury, and damages with the causation of liability neglect conducted by the Defendant's repeated and prolonged exposures with the causation of highly toxic hazardous chemical exposures, gases, fumes, and toxic solvents to the Plaintiffs which cause harm, illnesses, suffering, and damages. The Plaintiffs prays to the court for relief in damages and judgment against the Defendant for neglect and injury for which are entitled.

NATURE OF THE CASE

1. This is an action brought by Pro Se Plaintiffs in the State of North Carolina in accordance with N.C. Gen. Stat. § 1-52, complaining of the Defendant's neglect with the causation with highly toxic hazardous chemical exposures which damage, harm, and caused medical illnesses to the Plaintiffs;

2. As a direct result from the causation of the repeated chemical exposures, the Plaintiffs demand and request for appropriate relief for the suffering of pain, future medical treatment expenses, emotional distress, psychological, harm, lung scarring, lung nodules, hyper-reactive airway disease, asthma, chemical bronchitis, headaches, fatigue, physical damages suffered by Plaintiffs due to Defendant's tortious, neglect, and breach of duty care obligations actions;

3. The Plaintiff seeks declaratory relief, compensatory damages, punitive damages, damages, fees and litigation expenses as remedies for Defendants' violations of the Federal and North Carolina statutory as well as common law rights;

4. Through this Complaint, Plaintiffs as of right in the action commenced in this Court against the Defendant, LAN-WAY ROOFING CO., INC. 511 Saint Andrew Street, Tarboro, NC,

PARTIES

5. Plaintiff, Latonia Bilbo (hereinafter "Plaintiff"), is an citizen and resident adult individual residing at 532 Old Farm Rd, Fayetteville, NC 28314;

6. Plaintiff, Sandra Freddie (hereinafter "Plaintiff"), is an citizen and resident adult individual residing at 6841 Woodmark Drive, Fayetteville NC 28314;

7. Plaintiff, Lamar Ironhorse (hereinafter "Plaintiff"), is an citizen and resident adult individual residing at PO Box 164, Shannon, NC 28386;

8. Plaintiff, Fran McKinght (hereinafter "Plaintiff"), is an citizen and resident adult individual residing at 7016 Trevor Lane, Fayetteville, NC 28314;

9. Defendant, LAN-WAY ROOFING Co., Inc. (hereinafter "Defendant"), is a corporation at 511 Saint Andrew Street, Tarboro, NC 27886.

JURISDICTION AND VENUE

10. The Superior Court has jurisdiction of this action for relief and damages in accordance with N.C. Gen. Stat. § 1-52 against the Defendant for violation of various laws pertaining to neglect, liability, and injuries which caused harm with toxic hazardous chemicals, and solvents to the Plaintiffs in Cumberland County, North Carolina;

11. The Plaintiffs' Complaint and Pleadings is being brought under the North Carolina Laws for negligence, injury and various state tort claims;

12. The Plaintiffs asserts claims under North Carolina Common law for neglect and injury;

13. Plaintiffs seeks monetary relief for future medical expenses, compensatory, and punitive damages pursuant to applicable North Carolina State Law and the court has jurisdiction over the matter;

14. Cumberland County is the proper jurisdiction and venue for this action because the neglect and injury to the Plaintiffs and cause of action was committed in this county;

15. Cumberland County is the proper venue due to the causation of harm and neglect caused to the Plaintiffs was in the principal county;

16. The venue is proper, and the Defendants are subject to the personal jurisdiction of this Court because the Defendants maintain business work operations as roofing contractors in this county, and all of the events giving rise to the Plaintiffs' injuries and complaint to this action occurred in this county.

17. Cumberland County is the proper venue because the Defendant, the contractor, they used highly toxic hazardous chemicals for over a month was in this county and conducted large roofing with toxic chemicals on the located building in Fayetteville, Cumberland County, North Carolina which is in the county, and this court has proper jurisdiction and venue in this cause of action.

STATEMENT OF FACTS

18. The Plaintiffs are within the statute of time limits to file this claim against the Defendant, Lan-Way Roofing Co., Inc. for neglect and injury from the highly toxic chemical repeated exposures of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone, HPVX Fasteners Roofing Chemicals at 201 Hay Street, Fayetteville, Cumberland County, North Carolina.

19. On or around June 20, 2018, through June 22, 2018, the Plaintiffs started to suffer health effects from the negative symptoms from the Defendant's chemical exposures which was airborne concentrations of various toxic hazardous chemicals in the air, which was lethal when the combined highly toxic hazardous chemicals by the Defendant, Lan-Way Roofing Co., Inc was repeated and prolonged while the Defendant was doing roofing work on the building located at 201 Hay Street Fayetteville, Cumberland County, North Carolina.

20. The Plaintiffs suffered damages and ongoing medical complications by the Defendant, contractor, Lan-Way Roofing Co., Inc.'s neglect from the combined highly toxic chemicals, solvents, odors, of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX Fasteners Roofing chemicals.

21. All of the re-exposures by the Defendantwere combined with highly toxic chemicals, solvents, and odors which have cancer causing agents, have cause the Plaintiffs' asthma, fatigue, illness, inflammation, headaches, hyper reactive airway disease, cranial allergic chronic sinus infections, lung scarring, chemical bronchitis, lung nodules, disorient, blur vision, PTSD.

illness and sickness from the toxic chemical exposures continuously from June through August of 2018.

23. As a direct result, of the Defendant's neglect, the Defendant failed to inform the Plaintiff's in advance to do any large roofing on the building with the toxic chemicals, and put the Plaintiffs lives at "risk." The Plaintiffs have been harmed and damaged since 2018 from the combined toxic exposures and failed to safely handle all the toxic chemicals and failed to safely use the hazardous chemicals, thereby allowing them to intentionally be damaged to sustain injuries and illnesses repeatedly related to exposures to hazardous chemicals for months.

24. The Plaintiffs' elements in this negligence case against the Defendant for which establish liability are:

    (a) Defendant owed a duty to commit an act or refrain from committing an act with toxic chemical repeated exposures;
    (b) Defendant breached this duty;
    (c) This breach of duty caused negligence and injury to the Plaintiffs;
    (e) Defendant's actions of neglect were the proximate cause of the injuries
    (f) Defendant should have known this action of repeated highly toxic chemical exposures would have caused injuries to Plaintiffs;
    (g) Plaintiffs have suffered pain and actual damages (i.e., lost wages, hospital bills, etc.)

25. On or around Monday, June 25, 2018, the Plaintiffs were re-exposed to the various toxic chemicals again while the Defendant was neglectful again doing roofing work on the building as the toxic chemicals came into the building infecting the Plaintiffs with the chemical contamination through the air system which was inhaled, absorbed, and digested by the Plaintiffs for hours. This continuous repeated exposure to the toxic chemical was an combustion of highly combined toxic chemicals which infected the Plaintiffs, putting their life at risk and immentiant danger. All the chemicals were combined in the building, and shortly after the incident, the Plaintiffs sought immediate medical treatments for the illnesses.

26. In July of 2018, the Plaintiffs continued to get medical treatments from various medical professions in Cumberland County and Duke for the chemical exposures which damage their sinuses, blur vision, fatigue, skin irritants, pulmonary lung breathing problems, pain, fatigue, and urgent care for the repeated exposures from the Defendant's failure to safeguard the Plaintiffs from the combine toxic hazardous chemical exposures which were Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX Fasteners Roofing chemicals.

27. The Plaintiffs had a legal and equal right to know in advance that the Defendant was going to conduct roofing on the building to prevent being at risk, specifically, the use of the combined toxic chemicals that has damaged the Plaintiffs for years with residual health effects as they all need future medical treatments.

28. On July 4, 2018, the Plaintiffs were sent a email which indicated that the "roofing" was still being conducted, despite the Plaintiffs being lied to by the Defendants that the roofing with the chemicals of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone, HPVX Fasteners Roofing Chemicals had stopped. Further, on July 4, 2018 the building and the Plaintiffs were again re-exposed by the Defendant's toxic chemicals of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX

Fasteners Roofing chemicals.

29. In July of 2018, the Defendant failed to abide by regulations with the toxic chemicals and continued to put all toxic chemicals in the same proximity to the Plaintiffs, and chemical next to air system leaving the Plaintiffs to be re-exposed intentionally again, causing further damages to the Plaintiffs and on a continuous basis, the Defendant ignored the risk and health complications of the Plaintiffs.

30. The Plaintiffs breathe and absorb highly toxic hazardous, at no fault of their own, as the combined dust/fume/gas/mist/ vapors from the chemicals harmed and damaged their quality of life and put their life at risk. Evertime, the Defendant said they stopped roofing, and would never communicate with the Plaintiffs about the roofing and the use of toxic chemicals. The Plaintiffs lost their smell and taste due to the various combined toxic chemicals they were exposed to and therefore could not smell the chemicals in the air until an witness who specialized in occupational exposures advised them of the chemicals in the building by the roofing company.

31. On July 9, 2018, the Plaintiffs suffered again from the chemical exposures by the Defendant again, as the Defendant was still doing roofing and the glue adhesives were found in the air system on the roof, and the Plaintiffs' witnesses obtained the glue and brought the glue back into the building for examinations and confirmed it was glue adhesives the Plaintiffs was inhaling which damage the Plaintiffs again causing harm and medical complication with the lungs, breathing difficulty, nausea, blur vision, disorientation, burning skin irritants, fatigue, racing thoughts, cottonmouth, sinus problems of orange-red large discharge of very thick mucus, facial swelling, diarrhea, panic attacks, and non-urinitation. The chemicals were also all over the Plaintiffs' hair, skin, nails, shoes, clothing, jacket, chair.

32. The Defendant's neglect with the repeated toxic chemical exposures caused the Plaintiffs to be at risk and to continually be in a toxic hazardous surrounding and environment unknowingly. The exposures have caused damage to the Plaintiffs kidneys through prolonged and repeated exposures when the Plaintiffs absorbed chemicals through the skin. Many times, when the air was shut off in the building, the chemicals expanded 10 times the toxicity, causing the Plaintiffs more health effects while it was about 100 degrees outside.

33. In August of 2018, the Plaintiffs were severely ill from the repeated chemical toxic exposures by the Defendant the damage of all the combined toxic chemicals had already caused the Plaintiffs significant amount of damages with medical problems and medical complications, breathing difficulty, headaches, pain, disorientation, blur vision, fatigue, nausea to the Plaintiffs.

34. The Plaintiffs have been very ill, unwell, and sickly with ongoing medical complications since 2018 to 2021, from the neglect of the Defendant's repeated exposures of highly toxic were combustible materials the Plaintiffs inhaled for months of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone, HPVX Fasteners Roofing Chemicals.

35. Since 2018, the Plaintiff's medical diagnoses from the Defendant's gross negligence are breathing difficulty, shortness of breath, headaches, pain, disorientation, blur vision, fatigue, nausea, chronic rhinosinusitis, polyps, swelling in face, acute allergic reactions, skin irritation and burn, lung scarring, lung nodules, chemical bronchitis, asthma, kidney urinary problems, panic attacks, inflammation, diaherra, hyper reactive airway disease, including diagnoses of colon and stomach gastro problems,

among other medical illnesses issues by the illegal discharged repeated and combined highly toxic chemical exposures. The Plaintiffs also seek damages for residual health effects from the chemical exposures future medical expenses.

36. The repeated chemical exposures by the Defendant, Lan-Way Roofing Co., Inc. have damaged the Plaintiffs for this cause of action to file before the court for relief.

COUNT I
(NEGLIGENT)

37. The allegations of Paragraphs 1 through 36 of this Complaint are re-alleged and incorporated by reference.

38. On or about the date of June 20 through June 22, 2018 through later part of July of 2018, Plaintiffs were in the building located at 201 Hay Street, Fayetteville, NC, and the Defendant, Lan-Way Roofing Co., Inc., is neglectful while roofing using a mix-combined tour of highly toxic hazardous chemicals which spelled and came into the air system from the roof on the building with highly toxic chemicals, exposing the Plaintiffs for over one month at high levels of mixed and combined chemicals everyday for 8 hours each day.

39. The Plaintiffs were exposed to the various combined toxic chemicals for 8 hours a day, while the Defendant lied and deceived the Plaintiffs that they would stop roofing to get them to come back into the building. The Plaintiffs complaints were continuously ignored by the Defendant and exposed to Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX Fasteners Roofing chemicals.

40. The Defendant, Lan-Way Roofing Co., Inc., the contractor, is neglectful while roofing as an contractor in Fayetteville, Cumberland County, North Carolina using a mix-combined tour of highly toxic hazardous chemicals which infected and damaged the Plaintiffs airway, lungs, mental distress, cognition, and sinuses causing excessive pain and harm;

41. The Defendant breached their duty of care and refused to safeguard or protect the Plaintiffs knowing the harm the toxic chemicals would cause them while they breathe in the toxic chemicals, glue adhesives, and carbon monoxide coming into the air system and continuously kept using the combined toxic chemical to damage them and intentional put their lives at "risk" and imminent danger; which spelled and came into the air system from the roof on the building with highly toxic chemicals, exposing the Plaintiffs for over one month at high levels of mixed and combined chemicals everyday for 8 hours each.

42. The Defendant's neglect and breach of care has caused the Plaintiffs to suffer with medical issues, pain, surgeries, emotional distress, psychological, and physical harm. The neglect of the Defendant has caused the Plaintiffs to have thousands of dollars in medical bills and future medical treatments.

43. Defendant owed the Plaintiffs a duty care and not to exposed them to the combined mixed tour of combustions toxic hazardous chemicals and carbon monoxide which the direct harm and damages to the Plaintiffs are ongoing with pain, suffering, financial loss, emotional distress, physical, and psychological harm from the chemical exposures as a direct result.

44. The Plaintiffs incurred damages in excess of seventy-five thousand dollars ($75,000.00).

COUNT II
(Infliction of Emotional Distress)

45. The allegations of Paragraphs 1 through 45 of this Complaint are re-alleged and incorporated by reference.

46. Due to Defendant's negligence and failure, the Plaintiffs suffered financial, medically, physical, psychological, emotional distress, and harm to their detriment.

47. Defendant exhibited extreme and outrageous conduct in their failure with the toxic chemicals toward Plaintiffs and the Defendant repeated the exposures continuously for over one month, damaging the Plaintiffs in that Defendant, even failed to inform Plaintiffs of their scheduled dates when they kept roofing with the toxic chemicals in the heat of over 100 degrees index to allow the Plaintiffs to make informed decisions regarding their life and health, resulting in sustained medical issues, treatments, surgeries, emotional harm, and damages for Plaintiffs.

48. The Defendant would conduct the roofing work with toxic chemicals affecting the lungs of the Plaintiffs while in the building and shut the air off on the Plaintiffs keeping them from breathing while they were in the building causing the chemicals to "expand" in the heat 10 times the level in toxicity in July of 2018.

49. Defendant also failed to inform the Plaintiff's of how hazardous the chemicals are which the Plaintiffs have been severely affected with medical problems and damages as direct result of the Defendant failure.

50. Defendant's conduct resulted in reckless and neglectful behavior to the likelihood that such conduct will cause severe emotional distress to Plaintiffs.

51. The Defendant had no intentions to safeguard or provide care for the Plaintiffs, and was neglectful with breach of care and duty, as they continued to expose the Plaintiffs with repeated highly combined toxic chemical exposures with high level of toxicity in doses for over one month which as direct result have caused harm and damage.

52. The Defendant damaged the Plaintiffs for countless years as they have suffered with emotional harm, distress, financial loss, psychological and physical harm, and the need for future medical treatments.

53. The Plaintiffs incurred damages in excess over seventy-five thousand dollars ($75,000.00).

STATEMENT CLAIM FOR RELIEF

54. The allegations of Paragraphs 1 through 55 of this Complaint are re-alleged and incorporated by reference.

55. The Plaintiffs' statement of claim for which relief may be granted are the Plaintiffs' damages which is due to the neglect of the Defendant for damages as a direct result for repeatedly exposing the Plaintiffs to various haradious combine toxic chemicals of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl

various haradious combine toxic chemicals of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX Fasteners Roofing chemicals which were combined in toxicity exposed to the Plaintiffs and are all very highly toxic-flammable hazardous chemicals.

56. The Plaintiffs have been damaged by the Defendants neglect and toxic chemicals causing lung scarring, lung nodules, hyper re-airway disease, asthma, emotional-mental distress, PTSD, physical harm, chemical bronchitis, headaches, fatigue, depression, loss of finance, sinus surgeries, loss of quality of life, and future medical treatment expenses.

57. As a direct result, the Plaintiffs have suffered and continue to suffer from the Defendant's repeated exposures of Carbon Monoxide, Acetone, MEK-Butanone/ Methyl Ethyl Ketone, Glue, Toluene, Glue Adhesives, Liquid Ketone HPVX Fasteners Roofing chemicals. The effects of the combined toxic chemicals are cancer causing agents and all the Plaintiffs have medical complications as a direct result from the repeated chemical exposures by the Defendant from on and around June 22, 2018 through August of 2018. The Defendant's neglect and harm to the Plaintiffs have caused the years of medical complications and expenses damaging their quality of life and put their lives at risk due to the exposures and the Plaintiffs are entitled to all claims ao relief.

58. Plaintiff sues defendant for money due for the causation of damages and medical problems the Defendant caused by neglect with the repeated toxic chemical exposures incurred as direct result of the Defendant's failure in exposing the Plaintiffs from toxic chemicals from on and about June 20, 2018 through July 12, 2018 at 201 Hay Street, Fayetteville, North Carolina, while doing roofing on the building with excessive toxic combine chemicals which severely damaged the Plaintiffs and put the Plaintiffs' lives in imminent danger and at risk of death due to the combined and repeated highly toxic hazardous chemical exposures the Plaintiffs were infected by for months.

59. As a direct result of the Defendant's failure and causing the "repeated" toxic chemical exposures to the Plaintiffs causing excessive medical problems, future medical expenses, surgeries, and emotional-mental distress, the Plaintiffs states the claim for relief and request for punitive and compensatory damages, interest, court costs in relief.

60. As a direct result of the Defendant's failure and causing the "repeated" toxic chemical exposures to the Plaintiffs, the Defendant was advised not to conduct any roofing with the Plaintiffs were in the building while using the toxic chemicals and carbon monoxide which was not safeguarded by the Defendant and went into the air system chemical exposing the Plaintiffs "repeatedly."

61. The Plaintiffs were "repeatedly" exposed to deadly and cancer causing combined toxic chemicals which damaged them as they all sustained pain and suffering with medical complications and also with lung scars, lung nodules. The Plaintiffs symptoms from the chemical exposures have continued and therefore the Plaintiffs are entitled to relief.

62. For damages, the Plaintiffs combined incurred damages is in the excess claim over seventy-five thousand dollars ($75,000.00) and the Plaintiffs are entitled to all such relief through their claims for damages due to the Defendant neglect and failures which caused harm and injuries to the Plaintiffs for which they bring this claim before the court for relief and demand for jury trial.

63. Defendants' unlawful actions were intentional, willful, and/or done with reckless disregard to Plaintiff's right

64. The Plaintiffs is entitled to all reasonable future medical treatment expenses, fees and costs of suit

RELIEF FOR DAMAGES SUSTAINED

65. The allegations of Paragraphs 1 through 64 of this Complaint are re-alleged and incorporated by reference.

66. As a direct result of the Defendant's neglect and failure, of the injuries sustained to the Plaintiffs by the Defendant with the various repeated combined toxic chemical exposures which has caused harm to the Plaintiffs, the Plaintiff seeks a demand for judgement for relief of the damages and expenses for future medical treatments incurred.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs respectfully prays that:

1. As to Count I of this Complaint, Plaintiffs have and recover of the Defendant compensatory damages in an amount in excess of Seventy-Five Thousand and No/100thsDollars ($75,000.00);

2. As to Count II of this Complaint, Plaintiffs have and recover of the Defendant compensatory damages in an amount in excess of Seventy-Five Thousand and No/100ths Dollars ($75,000.00);

3. That the costs of this action be taxed against the Defendant;

4. That this case have a Trial By Jury Demanded on all issues so triable;

5. For such other and further relief as to the Court may seem just and proper.

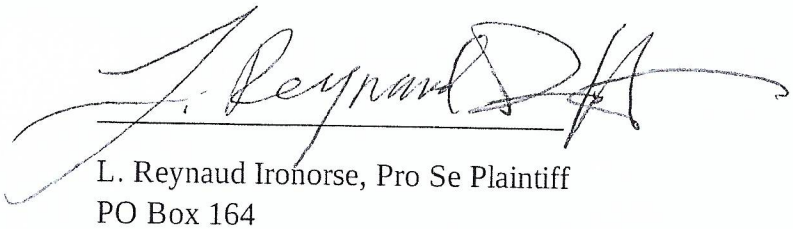
Respectfully submitted this the 14th day of June, 2021.

Latonia Bilbo

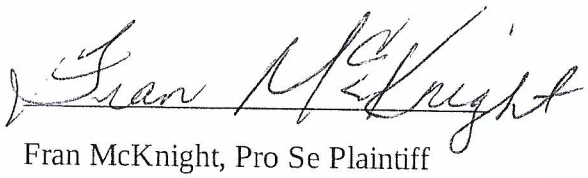
Latonia Bilbo, Pro Se Plaintiff
532 Old Farm Rd
Fayetteville NC 28314

Sandra Freddie

Sandra Freddie, Pro Se Plaintiff
6841 Woodmark Drive
Fayetteville NC 28314



L. Reynaud Ironorse, Pro Se Plaintiff
PO Box 164
Shannon, NC 28386



Fran McKnight, Pro Se Plaintiff
7016 Trevor Lane
Fayetteville, NC 28314

Pro Se for Plaintiffs

VERIFICATION

LATONIA BYRD says that he/she is the Plaintiff in this matter, that he /she has read and understood this COMPLAINT and knows the contents to be true of his/her own personal knowledge, except for those matters and things set forth upon information and belief; and as to those matters and things, he/she believes them to be true.

Latonia Byrd

Plaintiff

Sworn to and subscribed before me this 14 day of June, 2021

Lisa M. Smith

Notary Public

My commission expires: 06-26-23

LISA M. SMITH NOTARY PUBLIC CUMBERLAND COUNTY, NC

You are required to keep the Court advised of your current address and contact phone number. A Notice of Change of Address form is provided in this form packet.

VERIFICATION

Sandra Diane Freddie says that he/she is the Plaintiff in this matter, that he /she has read and understood this COMPLAINT and knows the contents to be true of his/her own personal knowledge, except for those matters and things set forth upon information and belief; and as to those matters and things, he/she believes them to be true.

Sandra Diane Freddie
Plaintiff

Sworn to and subscribed before me this 14 day of June, 2021.

Marvella C. Bassett
Notary Public

My commission expires: 5-16-2026

MARVELLA C. BASSETT
Notary Public, North Carolina
Cumberland County
My Commission Expires
5-16-26

You are required to keep the Court advised of your current address and contact phone number. A Notice of Change of Address form is provided in this form packet.

VERIFICATION

Fran McKnight says that he/she is the Plaintiff in this matter, that he /she has read and understood this COMPLAINT and knows the contents to be true of his/her own personal knowledge, except for those matters and things set forth upon information and belief; and as to those matters and things, he/she believes them to be true.

Fran McKnight
Plaintiff

Sworn to and subscribed before me this 14th day of June, 2024.

Notary Public

BHAVESH GODHANI NOTARY PUBLIC CUMBERLAND COUNTY, NC

My commission expires: 11/01/2025.

You are required to keep the Court advised of your current address and contact phone number. A Notice of Change of Address form is provided in this form packet.

VERIFICATION

L. Reynard Tronfhouse says that he/she is the Plaintiff in this matter, that he /she has read and understood this COMPLAINT and knows the contents to be true of his/her own personal knowledge, except for those matters and things set forth upon information and belief; and as to those matters and things, he/she believes them to be true.

L. Reynard Tronfhouse
Plaintiff

Sworn to and subscribed before me this 14 day of June, 2021.

Lisa M. Smith
Notary Public

My commission expires: 06-26-23

LISA M. SMITH NOTARY PUBLIC CUMBERLAND COUNTY, NC

You are required to keep the Court advised of your current address and contact phone number. A Notice of Change of Address form is provided in this form packet.

CERTIFICATE OF SERVICE

The foregoing Complaint and Pleadings was served on the caption listed party **LAN-WAY ROOFING Co., INC, 118 E St James St Suite 103, Tarboro, NC 27886** via certified U.S. Postal Mail and return receipt on the below listed date.

Date: this day of June 15 2021.

Latonia Bilbo, Pro Se Plaintiff
532 Old Farm Rd
Fayetteville NC 28314

Sandra Freddie, Pro Se Plaintiff
6841 Woodmark Drive
Fayetteville NC 28314

L. Reynaud Ironorse, Pro Se Plaintiff
PO Box 164
Shannon, NC 28386

Fran McKnight, Pro Se Plaintiff
7016 Trevor Lane
Fayetteville, NC 28314

Pro Se for Plaintiffs

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Street and Apt. No., or PO Box No.: 511 Saint Andrew Street
City, State, ZIP+4®: Tarboro, NC 27886

PS Form 3800, April 2015 PSN 7530-02-000-9047 — See Reverse for Instructions

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Tarboro, NC 27886			
Flat Rate			
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Certified Mail®			$3.60
Tracking #: 70200640000196828285			
Return Receipt			$2.85
Tracking #: 9590 9402 5590 9274 7508 10			
Total			$14.40
Grand Total:			$14.40
Cash			$20.00
Change			-$5.60

****
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